

JASON M. FRIERSON, NVSBN 7709
United States Attorney
District of Nevada

DAVID PRIDDY, ILSBN 6313767
Special Assistant United States Attorney
6401 Security Boulevard
Baltimore, MD 21235
Telephone: (510) 970-4801
Facsimile: (415) 744-0134
E-Mail: David.Priddy@ssa.gov

Attorneys for Defendant

UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA

JUDY ELIZABETH VADEN,

Plaintiff,

v.

KILOLO KIJAKAZI,
Commissioner of Social Security,

Defendant.

Case No.: 3:22-cv-00504-CSD

**UNOPPOSED MOTION FOR
EXTENSION OF TIME
(FIRST REQUEST)**

Defendant, Kilolo Kijakazi, Acting Commissioner of Social Security (Defendant) respectfully requests that the Court extend the time for Defendant to respond to Plaintiff's Motion for Remand (Dkt. No. 17, filed on May 18, 2023), currently due on June 20, 2023, by 30 days, through and including July 20, 2023. Defendant further requests that all subsequent deadlines be extended accordingly. This is Defendant's first request for an extension of time to file a response.

Good cause exists for this extension. Defendant respectfully requests this additional time because Defendant's counsel is experiencing an extremely heavy workload, despite due diligence. In addition to this case, the undersigned is preparing the Commissioner's response briefs for multiple district court cases with concurrent deadlines. The undersigned currently has five district court briefs

1 due within one week surrounding the current due date of the response brief in this case. For this
2 reason, Defendant's counsel requires additional time to properly address the issues raised in Plaintiff's
3 Motion for Remand. This request is made in good faith and with no intention to unduly delay the
4 proceedings.

5 Counsel for Defendant advised counsel for Plaintiff of the need for this extension on June 15,
6 2023. Counsel for Plaintiff's confirmed that Plaintiff does not object to this request.

7 It is therefore requested that Defendant be granted an extension of time to respond to Plaintiff's
8 Motion for Remand, through and including July 20, 2023.

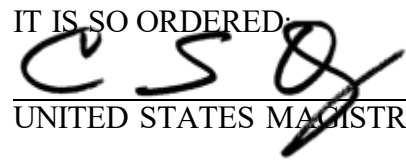
9
10 Dated: June 15, 2023

Respectfully submitted,

11 JASON M. FRIERSON
12 United States Attorney

13 /s/ David Priddy
14 DAVID PRIDDY
15 Special Assistant United States Attorney

16
17 IT IS SO ORDERED:

18 
19 UNITED STATES MAGISTRATE JUDGE

20 DATED: June 16, 2023
21
22
23
24
25
26